

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

1789 FOUNDATION INC., d/b/a CITIZEN  
AG, and ANTHONY GOLEMBIEWSKI,

*Plaintiffs,*

v.

AL SCHMIDT, in his official capacity as  
Secretary of the Commonwealth, and the  
COMMONWEALTH OF  
PENNSYLVANIA,

*Defendants,*

AFT PENNSYLVANIA, and the  
PENNSYLVANIA ALLIANCE FOR  
RETIRED AMERICANS,

*Intervenor-Defendants.*

Case No.: 3:24-cv-01865-RDM  
(Hon. Robert D. Mariani)

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**NOTICE OF VOLUNTARY DISMISSAL OF DEFENDANT COMMONWEALTH OF  
PENNSYLVANIA WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs 1789 Foundation, Inc. d/b/a “Citizen AG” and Anthony Golembiewski, by and through the undersigned counsel, hereby gives notice of its voluntary dismissal of Defendant Commonwealth of Pennsylvania. The Commonwealth has not served an answer or moved for summary judgment. Under rule 41(a)(1)(B), such dismissal is without prejudice.

Dated: March 6, 2025

Respectfully submitted,

/s/ Rachel L. Dreher

Rachel L. Dreher

CITIZEN AG

111 NE 1st St, 8th Floor

Miami, FL 33132

Tel: (442) 427-8136

[rachel@citizenag.org](mailto:rachel@citizenag.org)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 6, 2025, a true copy of the foregoing was filed and served via the Court's CM/ECF and/or NextGen electronic system upon all parties of record.

Dated: March 6, 2025

/s/ Rachel L. Dreher  
RACHEL L. DREHER